

EXHIBIT 13

BROWN DECLARATION IN SUPPORT OF MOTION TO EXCLUDE



Special Agreement Hiring Policy

Protocol for “Do Not Cold Call” and “Sensitive” Companies

The following companies have special agreements with Google and are part of the “Do Not Cold Call” list.

Effective March 6, 2005:

- Genentech, Inc.
- Intel Corporation
- Apple Computer
- Paypal, Inc.
- Comcast Corporation

Effective January 20, 2006:

- OpenTV Corporation
- Invidi Technologies Corporation

Effective April 10, 2006:

- Intuit Inc. (just the employees listed below)

Do not contact the following individuals from Intuit:

1. Alex Litner, SVP Corporate Dev & Strategy
2. Aline Baeck, UI
3. Angus Thomson, VP of Strategy
4. Atticus Tyson
5. Brad Smith, SVP QuickBooks Group
6. Craig Zarnier, PD
7. Ed Lee PM/PD
8. Gerald Huff, Architect
9. Hugh Molotsi, Team Lead, Google Search, AdWords, Local Listing
10. Jeff Demoss, PM
11. Lena Leacox, Team Lead/ Inventory Listing
12. Matt Hart, PM/PD
13. Randy Tinsley, VP of Corporate Development
14. Sergey Aldoukhov, PD
15. Stephen Aldrich, Quickbooks General Manager
16. Terry Hicks, Director QuickBooks Payroll Product Mgmt
17. Victor Cho
18. Young Yuk, PM

For each of these “Do Not Cold Call” companies, Google has agreed to the following protocol:

1. Not to directly cold call into those companies;
 2. But, we would accept internal or external references that indicated that an individual was “looking;”
 3. And, of course, we will also accept direct solicitation from a candidate (this will most likely come into play when an individual’s peer has recently joined us).
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Special Agreement Hiring Policy

Protocol for "Do Not Cold Call" and "Sensitive" Companies

Due to our partnerships, the following companies fall under the "**Sensitive**" companies list:

- AOL, Inc.
- AskJeeves, Inc.
- Earthlink, Inc.
- eBay, Inc. (excluding Paypal)
- NTL Incorporated

For each of these "**Sensitive**" companies we agreed to the following protocol:

1. Executive Recruiting: Inform EMG of any Director level or above candidate who we have engaged and who is starting the interview process at Google
2. Executive Recruiting: If we go to offer with a Director or above candidate, Staffing should inform EMG and EMG will designate a senior exec to place a courtesy call into the Sensitive company to let them know we have made an offer;
 - a. And by exception, when EMG deems necessary, calling into a Sensitive company to indicate we will be making an offer.
3. General Recruiting: For any non-exec position, we should be aware the company is on the Sensitive Company list but there are no restrictions to our recruiting from these companies at junior levels.

Please be cautious when recruiting teams from any company to keep our candidates and potential employees safe from legal action. Most companies have non-solicit agreements which would limit or prohibit a candidate from asking a coworker to interview with us as well.
